

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC

In the matter of:)
)
Albuquerque Hispanic Community Church) (See appendix A for file numbers)
and 244 other LPFM original construction)
permit applications.)
)

INFORMAL OBJECTION

One of the primary goals of REC Networks (“REC”)¹ is to assure a citizen’s access to the airwaves. Over the years, we have supported various aspects of non-commercial micro-broadcast efforts including Low Power FM (LPFM), proposals for a Low Power AM radio service as well as other creative concepts to use spectrum for one way communications.

REC feels that as many organizations as possible should be able to enjoy spreading their message to their local community. It is our desire to see a diverse selection of voices on the dial spanning race, culture, language, sexual orientation and gender identity. This includes a mix of faith-based and secular voices.

REC feels that attempts by larger organizations to infiltrate the LPFM service under the guise of questionable local presence would undermine the Commission’s goal of localism and violate the spirit of the recently passed Local Community Radio Act.

REC feels these applications are not truly local

We feel that the applications cited in Appendix A (“Guel Applications”) were not truly filed by these so-called local organizations but instead on behalf of a much larger organization with many LPTV holdings. Antonio Cesar Guel (“Guel”) is the President/CEO of Hispanic Christian Community Network, Inc. (“HCCN”) and holds a 100% attributable interest in 41 LPTV stations². During the first LPFM window, Guel was involved with the filing of several questionable LPFM applications for which REC objected to back then³.

¹ - REC Networks is the unincorporated entity name that identifies Michelle Eyre Bradley. REC is a major advocate of the LPFM service and operates various resources such as myLPFM (<http://mylpfm.com>).

² - See *Hispanic Christian Community Network, Inc.* Ownership Report, file number BOA-20120503ABO.

³ - See *Iglesia de Cristo Miel Meza*, file number BNPL-20010611ADY and related REC Informal Objection and Petition to Deny, also *Iglesia de Cristo Miel Tucson*, file number BNPL-20010611ADZ and related REC Informal Objection, also *Iglesia de Cristo Elim de Nashville*, file number BNPL-20010611ADT and related REC Informal Objection, also *Comunidad Cristiana of Denver*, file number BNPL-20010122ALA, et al. and related REC joint Informal Objection.

While Guel is not specifically a party to any of the applications other than the “technical contact”, there are specific patterns to these applications that should cause concern.

Same exact educational statement on these applications.

The applications filed during this window carried the same exact educational statement:

WE ARE ORGANIZED AS A NON-PROFIT EDUCATIONAL ORGANIZATION, WITH THE GOAL OF OFFERING EDUCATIONAL SERVICES FOR USE BY THE SPANISH SPEAKING PEOPLE IN OUR COMMUNITY (I) ADDRESSING IMPORTANT SOCIAL AND HEALTH BURDENS AFFECTING THE COMMUNITY, AND (II) IMPROVING THE OVERALL EDUCATIONAL LEVEL OF THE COMMUNITY.

IN KEEPING WITH THESE EDUCATIONAL PURPOSES, PROGRAMMING ON THE PROPOSED STATION WILL INCLUDE THE FOLLOWING:

1. RELIGIOUS INSTRUCTION, INCLUDING PROGRAMMING DESIGNED TO PROVIDE MORAL TEACHING AND ASSISTANCE IN MOMENTS OF SUFFERING DUE TO THE ILLNESS OR DEATH OF A LOVED ONE.
2. PROGRAMMING THAT PROVIDES INSTRUCTION AND COUNSELING WITH REGARD TO COMBATING ALCOHOL AND DRUG ABUSE.
3. PROGRAMMING IN THE SPANISH LANGUAGE DESIGNED TO ADDRESS AND PROVIDE ASSISTANCE FROM EXPERTS IN THE AREA OF FINANCE, TO HELP THE SPANISH SPEAKING PEOPLE IN THE LISTENING AUDIENCE ON LOANS, CREDIT CARDS, DEBT, FUNDING FOR COLLEGE EDUCATION, ETC.
4. PROGRAMMING DESIGNED TO ADDRESS COMMUNITY HEALTH ISSUES BY PROVIDING ASSISTANCE FROM PEOPLE FROM THE HEALTH DEPARTMENT, WHO WILL INFORM THE PUBLIC ABOUT HEALTH PROBLEMS AND ALSO OF ANY AVAILABLE AID IN THE COMMUNITY WITH DETAILS ON WHERE TO GO AND HOW TO OBTAIN IT.
5. PROGRAMMING DESIGNED TO ADDRESS AND PROVIDE ASSISTANCE TO THE PUBLIC IN OBTAINING (I) ESL ('ENGLISH AS A SECOND LANGUAGE') INSTRUCTION; (II) GED ('GENERAL EDUCATIONAL DEVELOPMENT') CERTIFICATION; AND (III) IMMIGRATION INFORMATION.

In this case, we do question whether there is a true local presence in each and every one of these communities as each educational statement does not specify the community served or address the specific needs of the community served by the station⁴.

⁴ - We note that even *Mesquite African American Community* has the same Spanish language oriented programming educational statement that the other 244 applications also have. See file number BNPL-20131112AGL.

Pattern of filing applications

In Appendix A, we give a list in order of the Application Reference Number (ARN) for each of the applications subject to this *Informal Objection*. You will notice that many of the applications filed on November 12 were done in alphabetical order, then on November 15, you see a pattern of applications filed (mostly in Texas) for _____ Hispanic Education Family Foundation (note the misspelling). When the applications are reviewed in this manner, there is an obvious pattern. In addition, in Section I of the application, while each application has a different legal name and address, they all share a common telephone number and e-mail address. The latter belonging to Mr. Guel at HCCN⁵.

Incorporated in Texas

These applications are all incorporated in the state of Texas. While there is no law that specifies that a non-profit organization be incorporated in their own state, it is quite ironic that all the sudden, 245 different, supposedly independent organizations all filed within several days of each other with the state of Texas with Guel listed as the organizer and Maria Cristina Guel listed as the registered agent of each of these organizations.

Some states have restrictions on out-of-state non-profits

Some states, such as Arizona, have restrictions on “foreign” non-profit corporations from “conducting affairs” within the state. In the case of Arizona, an additional authority to conduct affairs within the state would be required⁶. Other states, such as Utah⁷ and New York⁸ also have registration processes in order for foreign non-profits to conduct affairs in the state.

Issues discovered on specific applications

Utilizing a combination of REC’s own internal research on random applications as well as reports that REC has received from advocates in the LPFM community, there are many issues on various applications which could suggest an overall trend of misleading statements made on applications in order to secure construction permits.

Applicant may be placing main studios at post office box facilities

In the case of one Victorville, CA application⁹, the applicant has stated that the main studio is located at 12127 Mall Blvd, Victorville, CA 92392. REC’s own research has shown that this address is used by a UPS Store (in suite A) as well as a framing store, a nail salon and a Best Buy Store. A Google search¹⁰ shows that many businesses show an address of 12127 Mall

⁵ - cesarguelhccn@aol.com

⁶ - See Arizona Revised Statutes § 10-11501 and § 10-11503.

⁷ - See <http://corporations.utah.gov/business/fnp.html>

⁸ - See http://www.dos.ny.gov/corps/for_nfpfile.html

⁹ - See *Wealth Information Network Station*, file number BNPL-20131115AUA, facility ID 196930.

¹⁰ - See <https://www.google.com/search?q=businesses+at+12127+mall+blvd+victimville+ca&client=firefox-a&hs=Goz&rls=org.mozilla:en-US:official&ei=v-qBUqGrNeelsQTkolGQAg&start=10&sa=N&biw=946&bih=994>

Blvd. with a suite number beginning with “A” followed by a three digit number. It is our belief that that these “suites” are actually post office boxes at the UPS Store facility. Since the applicant did not state which suite their main studio is located, this raises an issue on the authenticity of this address as a main studio for a radio station.

Main studios in apartment complexes

We seriously question various applications where the main studios are located in apartment complexes. We have found examples in Denton, Texas¹¹; Grand Prairie, Texas¹² and Canoga Park, California¹³. These locations¹⁴ raise extreme suspicion because while it is physically possible to broadcast from an apartment or other rental property, it is highly unlikely that a property owner would permit this type of a “business” being operated out of a rental apartment, especially if it generates foot traffic and requires additional parking. In most areas, this type of a public location may violate zoning ordinances. In the definition of a main studio for the application scoring criteria, the Commission specifies that the proposed main studio location is to be *publically accessible*¹⁵. As specified in §73.872(b)(3) of the rules. Some locations, such as the Denton Application are located within gated communities. Such locations inhibit the general public from accessing the station’s main studio and thus further isolating the station from the community it is licensed to serve.

Non-existent street addresses for main studios

In the case of an application for Concord, California¹⁶, the applicant has given an address of 1970 Grand Street, Concord, California 94520. A search does not show such an address in Concord or does it show the existence of a Grand Street in the city of Concord. The nearest 1970 Grand Street is located 18 miles away in Alameda in ZIP Code 94501.

The Guel applications are holding up potential singletons from being granted

REC has identified 41 applications that if it were not for the Guel applications, they would be singleton and based on further review could be acceptable for filing¹⁷. Since the “organizations” in the Guel applications were just established in the state of Texas this year, none of these applicants will be able to claim the local presence point. Therefore, all of the Guel applications will have a maximum of four points. In most cases the non-Guel applications will prevail due to points. REC feels that it is very unfair to these organizations to be delayed due to

¹¹ - See *Organizacion Cristiana la Hermosa Internacional, Inc.*, file number BNPL-20131113BEI, facility ID 193731. (“Denton Application”)

¹² - See *Fundacion Esperanza Viva*, file number BNPL-20131113ABJ, facility ID 193738.

¹³ - See *Canoga Park Hispanic Community*, file number BNPL-20131112ADP, facility ID 193795.

¹⁴ - See Appendix C.

¹⁵ - See 47 CFR §73.872(b)(3).

¹⁶ - See *Concord Hispanic Community Radio*, file number BNPL-20131112AEJ, facility ID 193820.

¹⁷ - See Appendix “B”.

being in a MX group with an allegedly fraudulent application. These organizations have waited up to 13 years for this window to open and they should not be subjected to this unnecessary delay.

Requested Action

It is our belief that each of the organizations depicted in the applications may not be bona-fide organizations currently operating in the local communities. Searches for these organizations using major search engines were not able to find any listings for these organizations. Many of the “main studios” listed are actually apartments.

Based on Guel’s involvement in filings during the 2000 LPFM filing window, his other broadcast related attributable interests and taking into consideration the lessons learned from the excessive speculation during the 2003 Auction 83 FM Translator filing window¹⁸, we feel that we need to bring these applications to the attention of the Commission to assure that statements made to the Commission are true, complete, correct and made in good faith and therefore in the public interest.

REC is asking for these applications to either be dismissed or designated for hearing to determine the eligibility of each applicant and to determine whether truthful statements were made to the Commission. We feel that the Commission should perform an inquiry into the validity of these organizations. We feel that this can be done in part through requesting notarized statements from all parties mentioned on these applications, obtaining site assurances as well as assurances that the addresses listed as the main studio are available to the applicant to construct an LPFM studio. Such notarized statements should be done on the seal for the county in which the party resides as determined by the entry on the Form 318.

REC hopes the Commission takes action on this *Informal Objection* prior to the processing of LPFM mutually exclusive (“MX”) applications. We do note that these applications are currently mutually exclusive with many other LPFM applications. If all of these applications filed by Guel are dismissed, it will create 41 new singletons from groups that would otherwise go through the MX process.

REC puts our trust into the Commission to take whatever action on these applications and any future enforcement actions it deems necessary.

¹⁸ - See *Creation of a Low Power Radio Service, Fourth Report and Order and Third Order on Reconsideration*, 27 FCC Rcd 3364, 77 FR 21002 at 56. “...these types of speculative filings are fundamentally at odds with the core Commission broadcast licensing policies and contrary to the public interest.”

Conclusion

Over the years, REC and the other LPFM advocates have worked with the Commission to help develop the LPFM service in order to assure the localism aspect of the service, especially in light of the behavior that took place after the Auction 83 filing window was properly supported and enforced. We have over 2,000 LPFM applicants nationwide who are awaiting their construction permits. Of those applicants, some are mutually exclusive and may need to eventually file for the channels that are otherwise being blocked by these applications for potential major and minor changes.

We feel that the type of filings that were described in this *Informal Objection* were an egregious abuse of Commission resources and undermines the integrity of a local non-commercial, non-profit Low Power FM service and therefore is contrary to the public interest.

Therefore, we ask that the Commission DISMISS or DESIGNATE FOR HEARING the applications captioned in Appendix A.

Respectfully Submitted,

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December 2, 2013

APPENDIX A

**APPLICATIONS FILED BY
ANTONIO CESAR GUEL
THAT ARE THE SUBJECT OF THIS
*INFORMAL OBJECTION***

ARN		Facility ID	Community		Organization name
BNPL	20131112ABR	193768	ALBUQUERQUE	NM	ALBUQUERQUE HISPANIC COMMUNITY CHURCH
BNPL	20131112ABU	193771	ALEXANDRIA	VA	ALEXANDRIA HISPANIC COMMUNITY RADIO
BNPL	20131112ABW	193773	ANAHEIM	CA	ANAHEIM HISPANIC COMMUNITY RADIO
BNPL	20131112ABZ	193776	APPLETON	WI	APPLETON HISPANIC COMMUNITY CHURCH
BNPL	20131112ACE	193777	ARLINGTON HEIGHTS	IL	ARLINGTON HISPANIC COMMUNITY CHURCH
BNPL	20131112ACI	193779	ATLANTA	GA	ATLANTA HISPANIC COMMUNITY RADIO
BNPL	20131112ACR	193780	BABYLON	NY	BABYLON HISPANIC COMMUNITY RADIO
BNPL	20131112ACT	193782	BALCH SPRINGS	TX	BALCH SPRINGS RADIO DE LA COMUNIDAD
BNPL	20131112ADM	193784	BELLAIRE	TX	BELLAIRE RADIO OF THE COMMUNITY
BNPL	20131112ADO	193787	BOSTON	MA	BOSTON HISPANIC COMMUNITY RADIO
BNPL	20131112ADP	193795	CANOGA PARK	CA	CANOGA PARK HISPANIC COMMUNITY
BNPL	20131112ADQ	193797	CANOGA PARK	CA	COMMUNITY RADIO OF CANOGA PARK
BNPL	20131112ADR	193800	CHARLOTTE	NC	CHARLOTTE COMMUNITY RADIO
BNPL	20131112ADS	193801	CHICAGO	IL	CHICAGO HISPANIC COMMUNITY RADIO
BNPL	20131112ADZ	193803	CHULA VISTA	CA	CHULA VISTA COMMUNITY RADIO
BNPL	20131112AEC	194209	CINCINNATI	OH	CINCINNATI COMMUNITY RADIO
BNPL	20131112AEI	193816	COLUMBUS	OH	COLUMBUS COMMUNITY RADIO
BNPL	20131112AEJ	193820	CONCORD	CA	CONCORD HISPANIC COMMUNITY RADIO
BNPL	20131112AEK	193822	COSTA MESA	CA	COSTA MESA HISPANIC COMMUNITY RADIO
BNPL	20131112AEL	193825	DENVER	CO	DENVER COMMUNITY RADIO
BNPL	20131112AEM	193827	DETROIT	MI	DETROIT HISPANIC COMMUNITY RADIO
BNPL	20131112AEN	193828	DOLTON	IL	DOLTON HISPANIC COMMUNITY RADIO
BNPL	20131112AEO	193805	CICERO	IL	CICERO HISPANIC COMMUNITY RADIO

BNPL	20131112AFU	193829	MEMPHIS	TN	EAST MEMPHIS COMMUNITY RADIO
BNPL	20131112AFV	193833	PORTLAND	OR	EAST PORTLAND COMMUNITY RADIO
BNPL	20131112AFX	193837	FORT WORTH	TX	FORT WORTH HISPANIC COMMUNITY CHURCH
BNPL	20131112AFY	193842	GARY	IN	GARY HISPANIC COMMUNITY RADIO
BNPL	20131112AFZ	194076	GLENDALE	AZ	GLENDALE COMMUNITY RADIO
BNPL	20131112AGA	194078	GREENSBORO	NC	GREENSBORO COMMUNITY RADIO
BNPL	20131112AGB	194080	HARTFORD	CT	HARTFORD COMMUNITY RADIO
BNPL	20131112AGC	194082	HAZLET	NJ	HAZLER HISPANIC COMMUNITY RADIO
BNPL	20131112AGE	194087	KANSAS CITY	KS	KANSAS CITY COMMUNITY RADIO
BNPL	20131112AGF	194088	KELLER	TX	KELLER HISPANIC COMMUNITY CHURCH
BNPL	20131112AGG	194090	LAS VEGAS	NV	LAS VEGAS COMMUNITY RADIO
BNPL	20131112AGH	194091	LONG BEACH	CA	LONG BEACH HISPANIC COMMUNITY RADIO
BNPL	20131112AGJ	194092	LOS ANGELES	CA	LOS ANGELES HISPANIC COMMUNITY RADIO
BNPL	20131112AGK	194456	LOUISVILLE	KY	LOUISVILLE COMMUNITY RADIO
BNPL	20131112AGL	194457	MESQUITE	TX	MESQUITE AFRICAN AMERICAN COMMUNITY
BNPL	20131112AGM	194458	MESA	AZ	MEZA COMMUNITY RADIO
BNPL	20131112AGN	194459	MIAMI	FL	MIAMI HISPANIC COMMUNITY RADIO
BNPL	20131112AGO	194519	MILWAUKEE	WI	MILWAUKEE COMMUNITY RADIO
BNPL	20131112AGP	194521	MINNEAPOLIS	MN	MINNEAPOLIS COMMUNITY RADIO
BNPL	20131112AGQ	194523	NASHVILLE	TN	NASHVILLE COMMUNITY RADIO
BNPL	20131112AGR	194524	MARRERO	LA	NEW ORLEANS COMMUNITY RADIO
BNPL	20131112AGS	194526	NORFOLK	VA	NORFOLK COMMUNITY RADIO
BNPL	20131112AGT	194527	CHARLOTTE	NC	NORTH CHARLOTTE COMMUNITY RADIO
BNPL	20131112AGU	194528	CHICAGO	IL	NORTH CHICAGO HISPANIC COMMUNITY RADIO

BNPL	20131112AGV	194529	CINCINNATI	OH	NORTH CINCINNATI COMMUNITY RADIO
BNPL	20131112AGW	194531	COLUMBUS	OH	NORTH COLUMBUS COMMUNITY RADIO
BNPL	20131112AGX	194533	DENVER	CO	NORTH DENVER COMMUNITY RADIO
BNPL	20131112AGY	194534	FORT WORTH	TX	NORTH FORT WORTH HISPANIC COMMUNITY CHURCH
BNPL	20131112AGZ	194535	INDIANAPOLIS	IN	NORTH INDIANAPOLIS COMMUNITY RADIO
BNPL	20131112AHA	194537	KANSAS	KS	NORTH KANSAS CITY COMMUNITY RADIO
BNPL	20131112AHB	194541	NORTH LAS VEGAS	NV	NORTH LAS VEGAS COMMUNITY RADIO
BNPL	20131112AHC	194544	MIAMI	FL	NORTH MIAMI HISPANIC COMMUNITY RADIO
BNPL	20131112AHD	194545	MILWAUKEE	WI	NORTH MILWAUKEE NORTH COMMUNITY RADIO
BNPL	20131112AHE	194546	MINNEAPOLIS	MN	NORTH MINNNEAPOLIS COMMUNITY RADIO
BNPL	20131112AHF	194547	NASHVILLE	TN	NORTH NASHVILLE COMMUNITY RADIO
BNPL	20131112AHG	194551	ORLANDO	FL	NORTH ORLANDO COMMUNITY RADIO
BNPL	20131112AHJ	194576	PORTLAND	OR	PORTLAND COMMUNITY RADIO
BNPL	20131112AHM	194552	PITTSBURGH	PA	NORTH PITTSBURGH COMMUNITY RADIO
BNPL	20131112AHN	194554	RALEIGH	NC	NORTH RALEIGH COMMUNITY RADIO
BNPL	20131112AHO	194556	SAN ANTONIO	TX	NORTH SAN ANTONIO COMMUNITY RADIO
BNPL	20131112AHQ	194557	TAMPA	FL	NORTH TAMPA COMMUNITY RADIO
BNPL	20131112AHR	194558	WEST PALM BEACH	FL	NORTH WEST PALM BEACH
BNPL	20131112AHS	194561	PHILADELPHIA	PA	OAKLYN HISPANIC COMMUNITY RADIO
BNPL	20131112AHT	194562	ORLANDO	FL	ORLANDO COMMUNITY RADIO
BNPL	20131112AHU	194564	PHILADELPHIA	PA	PHILADELPHIA HISPANIC COMMUNITY RADIO
BNPL	20131112AHV	194565	MESA	AZ	PHOENIX COMMUNITY RADIO
BNPL	20131112AHW	194566	PITTSBURGH	PA	PITTSBURGH COMMUNITY RADIO
BNPL	20131112ALK	194577	PROVIDENCE	RI	PROVIDENCE COMMUNITY RADIO

BNPL	20131112ALL	194578	RALEIGH	NC	RALEIGH COMMUNITY RADIO
BNPL	20131112ALM	194579	RED BANK	NJ	RED BANK HISPANIC COMMUNITY RADIO
BNPL	20131112ALN	194580	ROCKWALL	TX	ROCKWALL RADIO DE LA COMUNIDAD
BNPL	20131112ALO	194582	SAINT LOUIS	MO	SAINT LOUIS COMMUNITY RADIO
BNPL	20131112ALP	194235	SALINAS	CA	SALINAS HISPANIC COMMUNITY RADIO
BNPL	20131112ALQ	194237	SALT LAKE CITY	UT	SALT LAKE CITY COMMUNITY RADIO
BNPL	20131112ALR	194238	SAN DIEGO	CA	SAN DIEGO COMMUNITY RADIO
BNPL	20131112ALS	194241	SAN FRANCISCO	CA	SAN FRANCISCO HISPANIC COMMUNITY RADIO
BNPL	20131112ALT	194244	CHULA VISTA	CA	SAN ISIDRO COMMUNITY RADIO
BNPL	20131112ALU	194245	SAN JOSE	CA	SAN JOSE HISPANIC COMMUNITY RADIO
BNPL	20131112ALV	194249	SAN PEDRO	CA	SAN PEDRO HISPANIC COMMUNITY RADIO
BNPL	20131112ALW	194251	SANTA MONICA	CA	SANTA MONICA HISPANIC COMMUNITY RADIO
BNPL	20131112ALX	194254	SEATTLE	WA	SEATTLE COMMUNITY RADIO
BNPL	20131112ALY	194256	SILVER SPRING	MD	SILVER SPRINGS HISPANIC COMMUNITY RADIO
BNPL	20131112ALZ	194261	SIMI VALLEY	CA	COMMUNITY RADIO OF SIMI VALLEY
BNPL	20131112AMA	194262	COVINGTON	KY	SOUTH CINCINNATI COMMUNITY RADIO
BNPL	20131112AMB	194263	DENVER	CO	SOUTH DENVER COMMUNITY RADIO
BNPL	20131112AMD	194265	DETROIT	MI	SOUTH DETROIT COMMUNITY RADIO
BNPL	20131112ARQ	193705	GRAND PRAIRIE	TX	IGLESIA PENTECOSTES DEL PRINCIPE DE PAZ
BNPL	20131112ARR	194064	BAYTOWN	TX	IGLESIA CRISTO VIENE OF BAYTOWN, INC.
BNPL	20131112ARY	193736	RALEIGH	NC	MINISTERIO GUERRERO DE JESUCRISTO INTERNACIONAL, INC
BNPL	20131112ASB	194050	ENNIS	TX	TEMPLO DE POWER
BNPL	20131112ASX	193863	HOUSTON	TX	IGLESIA MUNDIAL DE ORACION INC

BNPL	20131112ATB	193871	CONROE	TX	IGLESIA DE AMOR Y ALABANZA INC.
BNPL	20131112ATF	193874	HOUSTON	TX	CENTRO MUNDIAL DE ALABANZA INC.
BNPL	20131112ATP	193938	CONROE	TX	MINISTERIO DE RESTAURACION CONROE TEXAS
BNPL	20131112ATV	193940	HOUSTON	TX	CENTRO CRISTIANO DE AMOR INC.
BNPL	20131112ATY	193943	HOUSTON	TX	CENTRO CRISTIANO MUNDIAL FE Y AMOR INC.
BNPL	20131112AUD	193948	HOUSTON	TX	CENTRO CRISTIANO LA UNCION DE DIOS INC.
BNPL	20131112AUM	193950	HOUSTON	TX	CENTRO MUNDIAL DE FE INC.
BNPL	20131112AUP	193952	HOUSTON	TX	CENTRO CRISTIANO DE FE INC.
BNPL	20131112AUS	193962	HOUSTON	TX	IGLESIA FE Y AMOR DE DIOS INC.
BNPL	20131112AVA	194436	HUNTINGTON STATION	NY	LIBERTAD EN CRISTO
BNPL	20131112AVM	194446	WEST PALM BEACH	FL	CENTRO DE VIDA INC
BNPL	20131112AVS	194461	SAN JUAN	TX	LA PALABRA VIVIENTE MINISTRIES
BNPL	20131112AVX	194066	BAYTOWN	TX	VISION CELESTIAL
BNPL	20131112BDY	194267	INDIANAPOLIS	IN	SOUTH INDIANAPOLIS COMMUNITY RADIO
BNPL	20131112BDZ	194268	JACKSONVILLE	FL	SOUTH JACKSONVILLE COMMUNITY RADIO
BNPL	20131112BEA	194277	KANSAS CITY	MO	SOUTH KANSAS CITY COMMUNITY RADIO
BNPL	20131112BEB	194281	SOUTHLAKE	TX	SOUTH LAKE HISPANIC COMMUNITY CHURCH
BNPL	20131112BEC	194284	HENDERSON	NV	SOUTH LAS VEGAS COMMUNITY RADIO
BNPL	20131112BEE	194287	MIAMI	FL	SOUTH MIAMI HISPANIC COMMUNITY RADIO
BNPL	20131112BEF	194304	SAINT PAUL	MN	SOUTH MINNIAPOLIS COMMUNITY RADIO
BNPL	20131112BEH	194377	SAN ANTONIO	TX	SOUTH SAN ANTONIO COMMUNITY RADIO
BNPL	20131112BEJ	194398	TACOMA	WA	TACOMA COMMUNITY RADIO
BNPL	20131112BEL	194380	SOUTH SAN FRANCISCO	CA	SOUTH SAN FRANCISCO HISPANIC COMMUNITY RADIO
BNPL	20131112BEN	194395	SUGAR LAND	TX	SUGAR LAND COMMUNITY RADIO

BNPL	20131112BGW	194083	CEDAR HILL	TX	CEDAR HILL HISPANIC COMMUNITY CHURCH
BNPL	20131112BHF	194094	LOS ANGELES	CA	COMUNIDAD HISPANA DE LOS ANGELES
BNPL	20131112BHK	194549	GRETNA	VA	NORTH NEW ORLEANS COMMUNITY RADIO
BNPL	20131112BHM	194550	OKLAHOMA CITY	OK	NORTH OKLAHOMA CITY COMMUNITY RADIO
BNPL	20131112BHO	194536	JACKSONVILLE	FL	NORTH JACKSONVILLE COMMUNITY RADIO
BNPL	20131112BHQ	194555	SACRAMENTO	CA	NORTH SACRAMENTO COMMUNITY RADIO
BNPL	20131112BHR	194307	NASHVILLE	TN	SOUTH NASHVILLE COMMUNITY RADIO
BNPL	20131112BHS	194310	HARVEY	LA	SOUTH NEW ORLEANS COMMUNITY RADIO
BNPL	20131112BHU	194372	NORMAN	OK	SOUTH OKLAHOMA CITY COMMUNITY RADIO
BNPL	20131112BHW	194374	RALEIGH	NC	SOUTH RALEIGH COMMUNITY RADIO
BNPL	20131112BHX	194375	SALT LAKE CITY	UT	SOUTH SALT LAKE CITY COMMUNITY RADIO
BNPL	20131113AAO	194522	MISSOURI CITY	TX	MISSOURI CITY COMMUNITY CHURCH
BNPL	20131113AAS	194401	TAMPA	FL	TAMPA COMMUNITY RADIO
BNPL	20131113AAT	194402	VENICE	CA	VENICE HISPANIC COMMUNITY RADIO
BNPL	20131113AAU	194404	CLEVELAND	OH	WEST CLEVELAND COMMUNITY RADIO
BNPL	20131113AAV	194405	MEMPHIS	TN	WEST MEMPHIS COMMUNITY RADIO
BNPL	20131113AAX	194406	OKLAHOMA CITY	OK	WEST OKLAHOMA CITY COMMUNITY RADIO
BNPL	20131113AAY	194407	WEST PALM BEACH	FL	WEST PALM BEACH COMMUNITY RADIO
BNPL	20131113AAZ	194409	FAIRVIEW HEIGHTS	IL	WEST SAINT LOUIS COMMUNITY RADIO
BNPL	20131113ABC	195363	COACHELLA	CA	CADENA RADIAL EL SHADDAI
BNPL	20131113ABD	195354	CATHEDRAL CITY	CA	CADENA RADIAL ELOHIM
BNPL	20131113ABE	195343	LA QUINTA	CA	CADENA RADIAL REMANENTE
BNPL	20131113ABF	195336	RANCHO MIRAGE	CA	CADENA RADIAL MISION Y VISION
BNPL	20131113ABH	194525	CANOGA PARK	CA	CATEDRAL DE ALABANZA
BNPL	20131113ABI	193830	BROWNSVILLE	TX	MINISTERIO CIELOS DE GLORIA

BNPL	20131113ABJ	193738	GRAND PRAIRIE	TX	FUNDACION ESPERANZA VIVA
BNPL	20131113ABK	193742	EDINGBURG	TX	EDINGBURG TEMPLO BIBLICO PALABRA VIVIENTE
BNPL	20131113ABL	193821	LUFKIN	TX	LUFKIN IGLESIA CRISTO VIENE
BNPL	20131113AYH	195371	INDIO	CA	CADENA RADIAL EL MANANTIAL
BNPL	20131113BEI	193731	DENTON	TX	ORGANIZACION CRISTIANA LA HERMOSA INTERNACIONAL INC.
BNPL	20131113BEQ	194037	CONROE	TX	CENTRO CRISTIANA DE VIDA ETERNA CONROE TEXAS
BNPL	20131113BEX	195376	GRAND PRAIRIE	TX	RADIO ALFHA
BNPL	20131113BFF	193836	ROCKFORD	IL	CHRISTIAN RADIO NETWORK
BNPL	20131113BFJ	194794	BOCA RATON	FL	NATIONAL DISABLED VETERAN BUSINESS COUNCIL, INC
BNPL	20131113BJV	194069	RICHARDSON	TX	IGLESIA DE DIOS FE Y VERDAD EN PLANO, TX
BNPL	20131114ACE	194455	CHARLOTTE	NC	MOUNT CALVARY INTERNATIONAL CHURCH
BNPL	20131114ACG	194954	CYPRESS	TX	MINISTERIOS DEL INSTITUTO BIBLICO ELOHIM
BNPL	20131114ACI	193975	OCALA	FL	INSTITUCION EDUCATIVA BETHEL
BNPL	20131114ACJ	193845	DALLAS	TX	CASA DE RESCATE INC.
BNPL	20131114ACM	194669	MIAMI	FL	CENTRO EVANGELISTICO LATINOAMERICANO, INC
BNPL	20131114ACS	193973	BEAUMONT	TX	BEAUMONT IGLESIA CRISTO VIENE
BNPL	20131114ACT	194539	BROWNSVILLE	TX	GENERACION DE VISION CORPORACION
BNPL	20131114ACV	194452	KANSAS CITY	KS	IGLESIA PENTECOSTAL CASA DE DIOS PARA LAS NACIONES INC
BNPL	20131114ACX	194591	HOUSTON	TX	HOUSTON CENTRO CRISTIANO DE RESTAURACION
BNPL	20131114ACY	195078	MEXIA	TX	IGLESIA JESUCRISTO ES MI REFUGIO DE MEXIA TX, INC.
BNPL	20131114ADA	194796	HIALEAH	FL	ASOCIACION EDUCATIVA FAVIZ

BNPL	20131114ADC	194805	LAFAYETTE	LA	LAFAYETTE JESUCRISTO ES MI REFUGIO
BNPL	20131114ADE	194806	ROUND ROCK	TX	DIOS ABLA HOY
BNPL	20131114AOA	196075	MOBILE	AL	MOBILE HISPANIC EDUCATION FAMILY FOUNDATION
BNPL	20131114AOX	195643	ABILENE	TX	ABILENE HISPANIC COMMUNITY RADIO
BNPL	20131114AOZ	195653	WICHITA FALLS	TX	FAMILY CHRISTIAN RADIO OF WICHITA
BNPL	20131114APB	195666	WICHITA FALLS	TX	WICHITA FALLS HISPANIC AMERICAN FAMILY FOUNDATION
BNPL	20131114APE	195680	WICHITA FALLS	TX	WICHITA FALLS CESAR CHAVEZ FOUNDATION
BNPL	20131114APH	195685	WICHITA FALLS	TX	CASA AL IMIGRANTE DE WICHITA FALLS
BNPL	20131114APJ	195977	WICHITA FALLS	TX	COMUNIDAD CRISTIANA OF WICHITA FALLS
BNPL	20131114APN	195994	TULSA	OK	TULSA HISPANIC EDUCATION FAMILY FOUNDATION
BNPL	20131114APP	196012	TUCSON	AZ	TUCSON HISPANIC EDUCATION FAMILY FOUNDATION
BNPL	20131114APS	196024	BUFFALO	NY	BUFFALO HISPANIC EDUCATION FAMILY FOUNDATION
BNPL	20131114APX	196028	DES MOINES	IA	DES MOINES HISPANIC EDUCATION FAMILY FOUNDATION
BNPL	20131114APY	196032	COLUMBIA	SC	COLUMBIA HISPANIC EDUCATION FAMILY FOUNDATION
BNPL	20131114AQA	196038	BAKERSFIELD	CA	BAKERSFIELD HISPANIC EDUCATION FAMILY FOUNDATION
BNPL	20131114AQC	196042	BATON ROUGE	LA	BATON ROUGE HISPANIC EDUCATION FAMILY FOUNDATION
BNPL	20131114AQE	196050	FRESNO	CA	FRESNO HISPANIC EDUCATION FAMILY FOUNDATION
BNPL	20131114AQI	196053	LITTLE ROCK	AR	LITTLE ROCK HISPANIC EDUCATION FAMILY FOUNDATION
BNPL	20131114AQJ	196059	KNOXVILLE	TN	KNOXVILLE HISPANIC EDUCATION FAMILY FOUNDATION

BNPL	20131114AQK	196067	COLORADO SPRINGS	CO	COLORADO SPRINGS HISPANIC EDUCATION FAMILY FOUNDATION
BNPL	20131114AVZ	193980	IRVING	TX	FUEGO VIVO COMMUNICATIONS
BNPL	20131114AWG	194667	LAWRENCEVILLE	GA	NUEVA GENERACION MINISTERIO INC
BNPL	20131114AYO	194682	SAN ANTONIO	TX	OMEGA CHRISTIAN COMMUNICATIONS
BNPL	20131114AZE	194542	WATSONVILLE	CA	IGLECIA DE JESUCRISTO,ISRAEL,INC
BNPL	20131114AZY	194450	SACHSE	TX	IGLESIA CASA DE ORACION Y ALABANZA AG
BNPL	20131114BBF	194052	HOUSTON	TX	IGLESIA CRISTIANA AMOR Y RESTAURACION
BNPL	20131114BCC	195992	CHARLOTTE	NC	MONTE CALVARIO FOUNDATION, INC.
BNPL	20131114BDB	195678	MIAMI	FL	RADIO VOZ MUNDIAL INC
BNPL	20131114BEP	193851	CONROE	TX	CENTRO CRISTIANO DE PAZ Y AMOR INC.
BNPL	20131114BFP	195327	GARLAND	TX	WALNUT PARK ASSEMBLY OF GOD OF DALLAS
BNPL	20131114BHF	196998	CHICAGO	IL	DIVINE REDEEMER PRESBYTERIAN CHURCH
BNPL	20131114BIR	196694	MIAMI	FL	LLAMADOS PARA TRIUNFAR INC
BNPL	20131114BJQ	195332	DELRAY BEACH	FL	SION, MISION A LAS NACIONES, INC.
BNPL	20131114BLF	193966	LAKE CHARLES	LA	LAKE CHARLES IGLESIA CRISTO VIENE
BNPL	20131114BNE	194688	SAN YSIDRO	CA	LIBERTANDO LOS CAUTIVOS PRISONS MINISTRIES INC
BNPL	20131114BQU	194799	PHAR	TX	SAN JUAN TEMPLO BIBLICO PALABRA VIVIENTE
BNPL	20131114BSY	196710	PECOS	TX	PECOS IGLESIA EMMANUEL
BNPL	20131114BTS	196724	SAN ANTONIO	TX	SAN ANTONIO CHRISTIAN CHURCH
BNPL	20131114BUD	196849	LAREDO	TX	LAREDO HISPANIC COMMUNITY CHURCH
BNPL	20131114BWZ	194662	MCALLEN	TX	NUEVA IMAGEN COMMUNITY CHURCH
BNPL	20131114BXB	196887	GARLAND	TX	IGLESIA CRISTIANA EL REY YA VIENE

BNPL	20131114BXE	193958	HOUSTON	TX	CENTRO DE FE Y AVIVAMINETO DEL SANTO ESPIRITU INC.
BNPL	20131115ABM	197596	RED OAK	TX	RED OAK EDUCATIONAL COMMUNITY CHURCH
BNPL	20131115AEO	196391	EL PASO	TX	NORTH EL PASO HISPANIC EDUCATION FAMILY FOUNDATION
BNPL	20131115AET	196401	EL PASO	TX	WEST EL PASO HISPANIC EDUCATION FAMILY FOUNDATION
BNPL	20131115AEU	196408	EL PASO	TX	SOUTH EL PASO HISPANIC EDUCATION FAMILY FOUNDATION
BNPL	20131115AEV	196413	DEL RIO	TX	NORTH DEL RIO HISPANIC EDUCATION FAMILY FOUNDATION
BNPL	20131115AEX	196423	EAGLE PASS	TX	NORTH EAGLE PASS HISPANIC EDUCATION FAMILY FOUNDATION
BNPL	20131115AFE	197525	CORPUS CHRISTI	TX	SOUTH CORPUS CHRISTI HISPANIC EDUCATION FAMILY FOUNDATION
BNPL	20131115AFH	196431	LAREDO	TX	NORTH LAREDO HISPANIC EDUCATION FAMILY FOUNDATION
BNPL	20131115AFM	197533	MC ALLEN	TX	SOUTH MC ALLEN HISPANIC EDUCATION FAMILY FOUNDATION
BNPL	20131115AFV	197531	ODESSA	TX	NORTH ODESSA HISPANIC EDUCATION FAMILY FOUNDATION
BNPL	20131115AGD	197536	VICTORIA	TX	NORTH VICTORIA CHRISTI HISPANIC EDUCATION FAMILY FOUNDATION
BNPL	20131115AGF	197535	AMARILLO	TX	NORTH AMARILLO HISPANIC EDUCATION FAMILY FOUNDATION
BNPL	20131115AGJ	197539	LAWTON	OK	SOUTH LAWTON HISPANIC EDUCATION FAMILY FOUNDATION
BNPL	20131115AGN	197545	BROWNSVILLE	TX	SOUTH BROWNSVILLE HISPANIC EDUCATION FAMILY FOUNDATION
BNPL	20131115AHZ	197547	TYLER	TX	SOUTH TYLER HISPANIC EDUCATION FAMILY FOUNDATION
BNPL	20131115AIB	197550	VICTORIA	TX	SOUTH VICTORIA

					HISPANIC EDUCATION FAMILY FOUNDATION
BNPL	20131115AIG	197551	RENO	TX	NORTH RENO HISPANIC EDUCATION FAMILY FOUNDATION
BNPL	20131115AIT	196352	WACO	TX	AMISTAD BAPTIST CHURCH (ABC)
BNPL	20131115ALC	197148	CONROE	TX	IGLESIA DE AMOR Y ALABANZA INC.
BNPL	20131115ALQ	197143	GRAND PRAIRIE	TX	FUNDACION ESPERANZA VIVA
BNPL	20131115ANA	197552	LONGVIEW	TX	NORTH LONGVIEW HISPANIC EDUCATION FAMILY FOUNDATION
BNPL	20131115ANM	197157	WEST PALM BEACH	FL	NORTH WEST PALM BEACH
BNPL	20131115ANZ	196868	SANTA ANA	CA	PENTECOSTAL CHURCH OF GOD I.M.
BNPL	20131115AOC	197351	SUN VALLEY	CA	IGLESIA FUENTE DE VIDA, INC
BNPL	20131115AOL	197322	OXNARD	CA	LA IGLESIA CRISTIANA DE OXNARD
BNPL	20131115AON	197568	TEXARKANA	TX	NORTH TEXARKANA HISPANIC EDUCATION FAMILY FOUNDATION
BNPL	20131115AOU	197570	LUBBOCK	TX	NORTH LUBBOCK HISPANIC EDUCATION FAMILY FOUNDATION
BNPL	20131115AOY	197572	BOISE	ID	SOUTH BOISE HISPANIC EDUCATION FAMILY FOUNDATION
BNPL	20131115AOZ	197574	BELLEVUE	NE	SOUTH OMAHA HISPANIC EDUCATION FAMILY FOUNDATION
BNPL	20131115APC	197560	ALLIANCE	NE	ALLIANCE HISPANIC EDUCATION FAMILY FOUNDATION
BNPL	20131115ASS	197682	CHARLOTTE	NC	MOUNT CALVARY INTERNATIONAL CHURCH
BNPL	20131115ASY	197684	GREENVILLE	TX	CHURCH OF GOD- GREENVILLE, TX
BNPL	20131115ATT	197633	BAKERSFIELD	CA	WEST BAKERSFIELD HISPANIC EDUCATION FAMILY FOUNDATION
BNPL	20131115ATV	197637	OMAHA	NE	WEST OMAHA HISPANIC EDUCATION FAMILY FOUNDATION

BNPL	20131115ATZ	197665	DEL RIO	TX	UNION RADIAL CRISTIANA CIELOS ABIERTOS DEL RIO TEXAS
BNPL	20131115AUA	196930	VICTORVILLE	CA	WEALTH INFORMATION NETWORK STATION
BNPL	20131115AUI	197391	VICTORVILLE	CA	CENTRO INTERNACIONAL DE ORACION
BNPL	20131115AUX	197541	SAN ANGELO	TX	NORTH SAN ANGELO HISPANIC EDUCATION FAMILY FUNDATION
BNPL	20131115AVB	197666	SAN ANTONIO	TX	UNION RADIAL CRISTIANA CIELOS ABIERTOS DEL RIO TEXAS

APPENDIX B

**CURRENT MUTUALLY EXCLUSIVE APPLICATIONS
THAT WOULD HAVE BEEN SINGLETON
IF THE GUEL APPLICATIONS WERE NOT FILED**

Facility ID	Community		Organization name
191769	RALEIGH	NC	VALLEY STREAM OF RALEIGH HOMEOWNERS ASSOCIATION, INC.
191806	RALEIGH	NC	CAPITAL AREA TEAM SPORTS, INC.
191815	NORTH DADE	FL	AMERICAN MULTI-MEDIA SYNDICATE, INC.
191819	MIAMI BEACH	FL	MIAMI MULTI-MEDIA ASSOCIATION CORP
191878	NEW ORLEANS	LA	DELGADO COMMUNITY COLLEGE ¹⁹
194262	COVINGTON	WA	24-7 BROADCASTING, INC.
192016	MESA	AZ	SAN TAN EDUCATIONAL MEDIA
192230	ALBUQUERQUE	NM	FUTURE BROADCASTERS INC
194849	HOUSTON	TX	BETHESDA IGLESIA HISPANA INTERNATIONAL
193392	NEW ORLEANS	LA	NEW ORLEANS SOCIETY OF INFECTIOUS DISEASES AWARENESS
193411	RENO	NV	SONRISE CHURCH D/B/A CALVARY CHAPEL OF NORTHWEST RENO
195472	WASHINGTON	DC	SINCERE SEVEN
195501	COLUMBUS	OH	FILM COUNCIL OF GREATER COLUMBUS, INC
196496	CAMAS	WA	THE WAY TO SALVATION COMMUNITY CHURCH
194813	DALLAS	TX	IGLESIA EVANGELICA VIDA Y ESPERANZA
195328	ENNIS	TX	EVANGELISTIC MESSENGERS ASSOCIATION CHURCH
195405	PHOENIX	AZ	ARIZONA INTERFAITH ALLIANCE FOR WORKER JUSTICE
194122	MISSION	TX	EL DIVINA REDENTOR DE LAS ASSEMBLEAS DE DIOS, INC.
197651	OQUIRRH	UT	UTAH DEPARTMENT OF TRANSPORTATION ²⁰
194839	HOLLYWOOD	FL	BROWARD JEWISH ALLIANCE, INC.
195711	OKLAHOMA CITY	OK	OKLAHOMA CATHOLIC FAMILY CONFERENCE, INC.
195081	SALT LAKE CITY	UT	VANESSA MARTINEAU
194790	WEST PALM BEACH	FL	CARIBBEAN HERITAGE FOUNDATION
135044	INDEPENDENCE	KY	RGS COMMUNICATIONS, INC. ²¹
197000	KANSAS CITY	MO	ROBERT CARTER JR.
196730	SAN ANTONIO	TX	SAN ANTONIO VOICE, INC.
194596	MISSION	TX	LA RESPUESTA CHURCH MINISTRIES
195133	EDINBURG	TX	ROSALINDA C. RAABE MINISTRIES
196230	DORAL	FL	DIOS CON NOSOTROS
194671	CONROE	TX	FUENTE DE VIDA – CONTROE, INC.

¹⁹ - Note that the Guel application specifies a community of license in Gretna, Virginia.

²⁰ - Utah declared this their “priority” application. See 47 CFR §73.855(c)(1).

²¹ - Major change application for LPFM station WGIO-LP.

197095	SAN DIEGO	CA	PROPHET WORLD BEAT PRODUCTIONS
194779	HOPKINS	SC	FRIENDS OF INDEPENDENT PUBLIC RADIO SOUTHEAST LTD.
194904	LAREDO	TXT	EUCHARISTIC SOCIETY, INC.
194952	OMAHA	NE	OMAHA COMMUNITY BROADCASTING
195254	MANITOU SPRINGS	CO	NEVVUE PRODUCTIONS, INC.
196880	PALM DESERT	CA	XAVIER COLLEGE PREPARATORY HIGH SCHOOL
195484	ADELANTO	CA	CALVARY CHAPEL VICTOR VALLEY D/B/A CALVARY CHAPEL ADELANTO
197285	CONCORD	NC	ROCK U RADIO CORP
196947	EL PASO	TX	SIN FRONTERAS ORGANIZING PROJECT
196442	BAKERSFIELD	CA	COUNCIL OF MESSIANIC JEWISH MINISTRIES INTERNATIONAL
197175	SANTA ANA	CA	LA SEMILLA

APPENDIX C

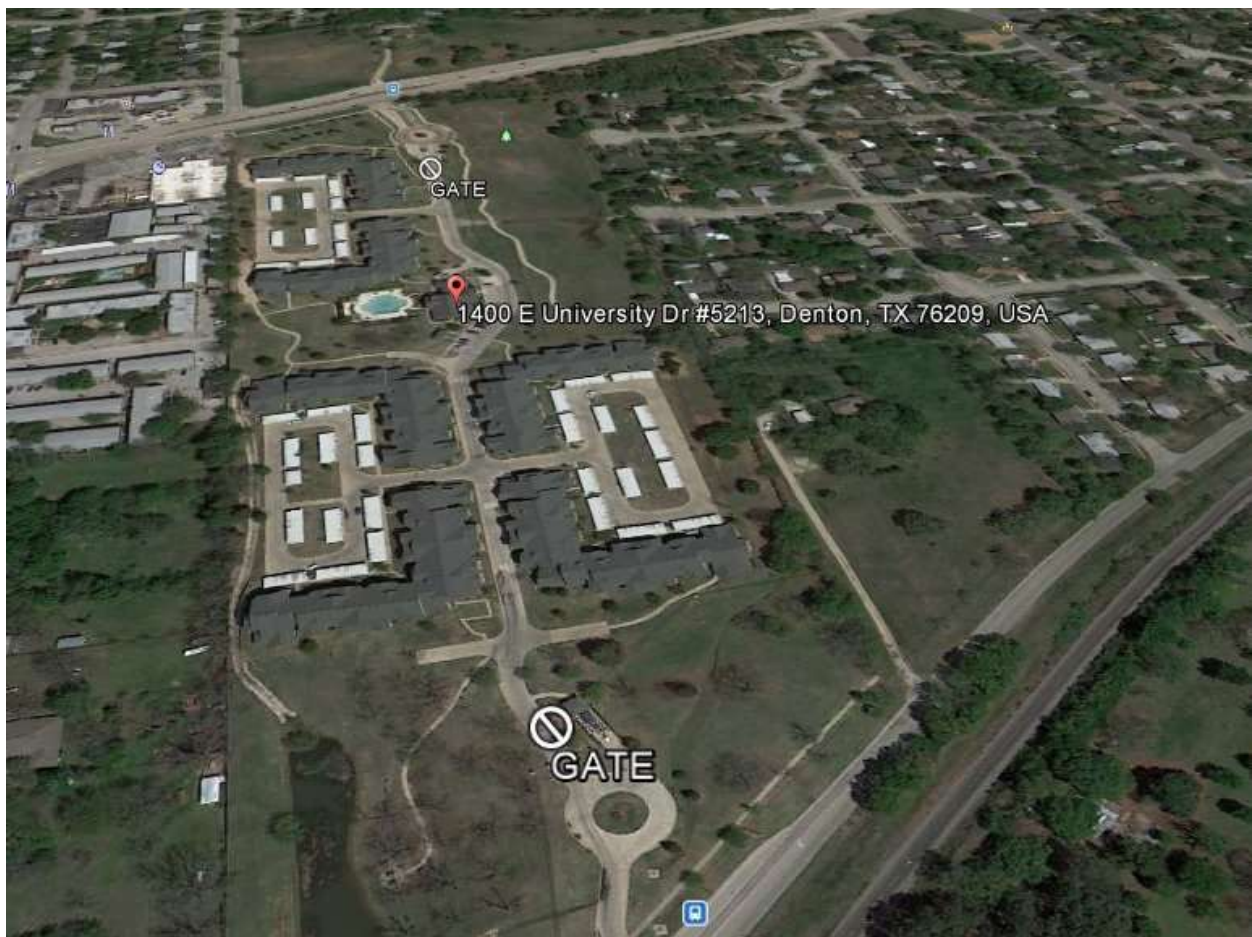
**EXAMPLES OF MAIN STUDIOS
LOCATED IN APARTMENT BUILDINGS**

BNPL-20131113BEI

Facility ID 193731

Main studio address:
1400 E University Dr.
Apt 5213
Denton, TX 76209

This location is inside a gated apartment community. It is highly unlikely that an apartment complex owner or condominium association would approve of a radio broadcast station that proposes to program at least 8 hours of local programming from this location. In addition, as the area is in a gated community, public access to the main studio would be impeded.



BNPL-20131113ABJ

Facility ID: 193738

Main studio address:

1350 Skyline Rd.


Apt 1021

Grand Prairie, TX.

The Homes of Mountain Creek Apartments.

It is highly unlikely that an apartment complex owner or condominium association would approve of a radio broadcast station that proposes to program at least 8 hours of local programming from this location with all of the foot traffic and the need for access to the public.

www.apartmentratings.com/rate/TX-Grand-Prairie-The-Homes-of-Mountain-Creek.html

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[Grand Prairie Apartments](#) View Photos, Floorplans, Amenities, Check Availability & Rental Rates. [www.rent.com/](#)



The Homes of Mountain Creek
1350 Skyline Road, Grand Prairie, TX 75051
[WEBSITE](#) [SAVE FAVORITE](#)

AVERAGE RATING

RECOMMENDED BY:
24%

OVERALL RATING:
2.4

PARKING: 2.5

MAINTENANCE: 2.5

CONSTRUCTION: 2.5

NOISE: 2.5

GROUND: 2.5

SAFETY: 2.5

OFFICE STAFF: 2.4



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BNPL-20131112ADP

Facility ID: 193795

Main Studio Address:

21205 Roscoe Blvd

Apt 71

Canoga Park, CA 91304

This location is inside a secured apartment community. It is highly unlikely that an apartment complex owner or condominium association would approve of a radio broadcast station that proposes to program at least 8 hours of local programming from this location.

